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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Plaintiff,

v.

ONE PARCEL OF REAL ESTATE
PROPERTY LOCATED AT 9414 PLAZA
POINT DRIVE, MISSOURI CITY, TEXAS,
77459

Defendant.

) CIVIL CASE NO. 20-02013 VC
) [Filed March 23, 2020]

) NOTICE OF RELATED CASE
) IN A CRIMINAL ACTION

) Case No. 20-CR-00249 RS
)) [Filed June 22, 2020]

Plaintiff

BOWI AND MARCUS ANDRADE

Defendant

[CAPTION CONTINUES NEXT PAGE]

1	UNITED STATES OF AMERICA,) Case No. CR 20-0260 CRB
) [Filed June 25, 2020]
2	Plaintiff,)
)
3	v.)
)
4	JACK ABRAMOFF,)
)
5	Defendant.)
)

8 The United States, pursuant to Local Criminal Rule 8-1, hereby notifies the Court that the two
 9 above-captioned criminal cases are related, and that these two criminal cases may be related to a
 10 pending civil case in this District.

11 The first-filed case, *United States of America v. One Parcel of Real Estate Property Located at*
 12 *9414 Plaza Point Drive, Missouri City, Texas, 77459*, Case No. 20-CV-02013 VC, was filed on March
 13 23, 2020. In that civil forfeiture action, the United States alleges that the defendant property named in
 14 the above caption is subject to forfeiture under Title 18, United States Code, Sections 981(a)(1)(A) and
 15 (a)(1)(C). The complaint alleges that the defendant property was purchased using the proceeds of funds
 16 derived from a wire fraud scheme and money laundering transactions in which Rowland Marcus
 17 Andrade was involved.

18 A criminal indictment, *United States v. Rowland Marcus Andrade.*, Case No. 20-CR-00249 RS,
 19 was filed on June 22, 2020 and unsealed on June 25, 2020. The indictment charges Rowland Marcus
 20 Andrade with one count of wire fraud, 18 U.S.C. § 1343, and one count of money laundering, 18 U.S.C.
 21 § 1956(a)(1), alleging that Andrade engaged in scheme to defraud related to the sale of a purported new
 22 cryptocurrency called AML Bitcoin. The indictment also includes a criminal forfeiture allegation, under
 23 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), seeking forfeiture, upon conviction, of the same
 24 property at issue in the civil forfeiture action.

25 A criminal information, *United States v. Jack Abramoff*, Case No. CR 20-0260 CRB, was filed
 26 on June 25, 2020. That information charges Jack Abramoff with one count of conspiracy to commit an
 27 offense against the United States, namely wire fraud, in violation of 18 U.S.C. § 371. The information
 28 names as a co-conspirator Marcus Andrade, and alleges a conspiracy to make false statements regarding

1 the cryptocurrency AML Bitcoin. The information also alleges that Abramoff violated the registration
2 requirement of the Lobbying Disclosure Act by failing to register as a lobbyist after being retained to
3 have a lobbying contact or having a lobbying contact.

The allegations in the civil forfeiture action, the indictment, and the information, each involve the activities of Andrade and his company, NAC Foundation, LLC, in connection with the sale of AML Bitcoin, and the cases involve the same period of alleged criminal conduct by Andrade, 2017 and 2018. The allegations in the cases therefore relate to the same events, occurrences, transactions, and property, and each action involve similar allegations. Because of the facts and allegations common to each action, the actions may entail substantial duplication of labor if heard by different judges. For these reasons, pursuant to Local Rule 8-1(c)(4), the government believes that assignment to a single judge is likely to conserve judicial resources and promote an efficient determination of the action.

12 | DATED: June 25, 2020

Respectfully submitted,

DAVID L. ANDERSON
United States Attorney

/s/
LLOYD FARNHAM
CHRIS KALTSAS
Assistant United States Attorneys